

Attorney General's Office
Department of DMV/DPS
555 Wright Way
Carson City, NV 89711

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LORI MCGRATH,

Plaintiff,

v.

STATE OF NEVADA, DEPARTMENT OF
PUBLIC SAFETY, NEVADA HIGHWAY
PATROL,

Defendant

Case No.: 3:07-cv-00292-LRH-VPC

**STIPULATION FOR ENLARGEMENT OF
TIME TO FILE MOTION FOR SUMMARY
JUDGMENT and OPPOSITION TO
MOTION FOR SUMMARY JUDGMENT
AND ORDER**

Defendant, STATE OF NEVADA, DEPARTMENT OF PUBLIC SAFETY, NEVADA HIGHWAY PATROL, by and through counsel, CATHERINE CORTEZ MASTO, Attorney General of the State of Nevada, MICHAEL D. JENSEN, Senior Deputy Attorney General, and Plaintiff, LORI MCGRATH by and through counsel IAN E. SILVERBERG, ESQ., hereby stipulate to, and move this Court for, an enlargement to time for Defendants to file a Motion for Summary Judgment until August 15, 2008 and Plaintiff an enlargement of time to file an Opposition to Motion for Summary Judgment to October 15, 2008.

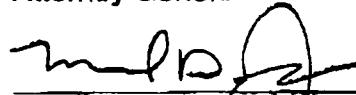
The discovery cut-off date was June 30, 2008. As a result, the Defendant's Motion for Summary Judgment is currently due on July 30, 2008. The Plaintiff's Deposition was conducted on June 23, 2008. The Defendant's request for an enlargement of time is based on its Attorney, Michael Jensen, being out of the office for approximately two (2) weeks during the month of July on work related matters, and the increased attorney workload of Mr. Jensen

1 due to being short one attorney in a four attorney unit of the Office of the Attorney General
 2 which represents the Department of Public Safety and the Department of Motor Vehicles in
 3 Carson City, Nevada. Additionally, the Plaintiff's attorney, Ian E. Silverberg, Esq. is going to
 4 be out of the country for the month of September. As a result, the parties agree that his
 5 opposition would not be due until October 15, 2008. This will give Mr. Silverberg four (4)
 6 weeks to prepare the Opposition to Motion for Summary Judgment. The Stipulation for
 7 Enlargement of Time is not being made for the purpose of delay.

8 Dated this _____ day of July 2008.

Dated this 21st day of July 2008.

CATHERINE CORTEZ MASTO
 Attorney General


 MICHAEL D. JENSEN
 Senior Deputy Attorney General
 Attorneys for Defendants


 IAN E. SILVERBERG, ESQ.
 Attorney for Plaintiff

16 IT IS SO ORDERED.

17 DATED this 25th day of July, 2008


 LARRY R. HICKS
 UNITED STATES DISTRICT JUDGE

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